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January 17, 2020

Via CM/ECF System

The Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Petitioner Fang's Response to Government's Letter (Dkt. #274)
United States v. Dan Zhong, 16-CR-614 (AMD)
Our Ref: 34768

Dear Judge Donnelly:

We represent Petitioner Xiaohong Fang, who previously appeared *pro se* in the above-referenced matter.

Pursuant to Your Honor's December 19, 2019 Scheduling Order, we write in response to the Government's January 10, 2020 letter (Dkt. #274), which requests that the petitions of Ms. Fang and Development Group of NYP, LLC for criminal forfeiture ancillary hearings (Dkts. #268 & #270, respectively) be held in abeyance while the Government "takes steps to issue direct notices and commence publication in accordance with the statutory scheme." *See* 21 U.S.C. § 853(n) & Fed. R. Crim. P. 32.2(c). The Government further proposes that it submit a status report within ninety (90) days to advise "whether it has completed the steps necessary to commence the ancillary proceeding by providing notice to all potential third-party claimants."

As indicated in the Government's letter, Ms. Fang consents to holding her petition in abeyance for at least ninety days, without prejudice, to allow the Government to perform its due diligence and undertake its statutory obligations.

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We thank the Court for its attention to the foregoing and stand ready to answer any questions that Your Honor may have with respect to Ms. Fang's petition.

Respectfully submitted,
HILL RIVKINS LLP



Justin M. Heilig

Cc: All counsel of record (via ECF)